

TOGUT, SEGAL & SEGAL LLP
Bankruptcy Conflicts-Counsel for Delphi Corporation, et al.,
Debtors and Debtors in Possession
One Penn Plaza, Suite 3335
New York, New York 10119
(212) 594-5000
Neil Berger (NB-3599)

Delphi Legal Information Hotline:
Toll Free: (800) 718-5305
International: (248) 813-2698

Delphi Legal Information Website:
<http://www.delphidocket.com>

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
-----	x	

**NOTICE OF PRESENTMENT OF JOINT STIPULATION
AND AGREED ORDER ALLOWING PROOF OF CLAIM
NUMBER 9940 AND EXPUNGING PROOF OF CLAIM NUMBER 16490
(WAUPACA FOUNDRY INC. N/K/A THYSSENKRUPP WAUPACA, INC./
SPCP GROUP, LLC/DEUTSCHE BANK SECURITIES INC.)**

PLEASE TAKE NOTICE that on March 16, 2007, Delphi Corporation and certain of its subsidiaries and affiliates, debtors and debtors-in-possession in the above-captioned cases (collectively, the "Debtors"), objected to proof of claim number 16490 ("Claim 16490") filed by Waupaca Foundry Inc. n/k/a ThyssenKrupp Waupaca, Inc. ("ThyssenKrupp") and subsequently transferred by ThyssenKrupp to SPCP Group, LLC ("SPCP") and by SPCP to Deutsche Bank Securities Inc. ("Deutsche Bank" and, together with ThyssenKrupp and SPCP, the "Claimants") pursuant to the Debtors' Tenth Omnibus Objection (Procedural) Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Duplicate and Amended Claims and (B) Equity Claims

(Docket No. 7300) (the "Tenth Omnibus Claims Objection"); and

PLEASE TAKE FURTHER NOTICE that on June 15, 2007, the Debtors objected to proof of claim number 9940 ("Claim 9940") filed by ThyssenKrupp and subsequently transferred by ThyssenKrupp to SPCP and by SPCP to Deutsche Bank pursuant to the Debtors' Seventeenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. § 502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected on Debtors' Books and Records, (C) Insurance Claim Not Reflected on Debtors' Books and Records, (D) Untimely Claims and Untimely Tax Claims, and (E) Claims Subject to Modification, Tax Claims Subject to Modification, and Modified Claims Asserting Reclamation (Docket No. 8270) (the "Seventeenth Omnibus Claims Objection"); and

PLEASE TAKE FURTHER NOTICE that the Debtors and the Claimants have agreed to settle the Tenth Omnibus Claims Objection and the Seventeenth Omnibus Claims Objection with respect to Claim 16490 and Claim 9940, respectively, and, either because these claims involve an ordinary course controversy or pursuant to the Order Under 11 U.S.C. §§ 363, 502, And 503 And Fed. R. Bankr. P. 9019(b) Authorizing Debtors To Compromise Or Settle Certain Classes Of Controversy And Allow Claims Without Further Court Approval (Docket No. 4414), have (i) entered into a Settlement Agreement, dated as of January 8, 2008 (the "Settlement Agreement"), and (ii) executed a Joint Stipulation and Agreed Order Allowing Proof of Claim Number 9940 and Expunging Proof of Claim Number 16490 (Waupaca Foundry Inc. n/k/a ThyssenKrupp Waupaca, Inc./SPCP Group, LLC/Deutsche Bank Securities Inc.) (the "Joint Stipulation").

PLEASE TAKE FURTHER NOTICE that, pursuant to the Settlement Agreement and the Joint Stipulation, the Debtors and the Claimants have agreed to disallow and expunge Claim 16490 in its entirety and allow Claim 9940 as a general unsecured non-priority claim against Delphi Automotive Systems LLC in the amount of \$6,678,072.

PLEASE TAKE FURTHER NOTICE that the Debtors will present the Joint Stipulation for consideration at the hearing scheduled for January 31, 2008, at 10:00 a.m. (prevailing Eastern time) in the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
January 23, 2008

DELPHI CORPORATION, *et al.*
By their attorneys,
TOGUT, SEGAL & SEGAL LLP
By:
/s/ Neil Berger
NEIL BERGER (NB-3599)
A Member of the Firm
One Penn Plaza
New York, New York 10119
(212) 594-5000